

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

MICHAEL WALLACE, et al.,)	
)	
Plaintiffs,)	
)	
v.)	
)	Case No. 4:18-cv-00503
COMMUNICATIONS UNLIMITED, INC.,)	
et al.,)	
)	
Defendants.)	

**DEFENDANTS' MOTION TO COMPEL
INDIVIDUAL ARBITRATIONS AND TO STAY LITIGATION**

Defendants C.U. Employment, Inc., Communications Unlimited of the South, Inc., and Communications Unlimited Contracting Services, Inc. (collectively, "Defendants"), by and through their undersigned counsel, respectfully request that this Court enter an order under the Federal Arbitration Act, 9 U.S.C. §§ 1, *et seq.*:

1. Compelling Plaintiff Michael Wallace to arbitrate his claims on an individual basis against Defendants;
2. Compelling Plaintiff Christian Johnson to arbitrate his claims on an individual basis against Defendants;
3. Compelling Plaintiff Jeffrey Super to arbitrate his claims on an individual basis against Defendants;
4. Staying all further proceedings in this case pending the arbitration, including the time for Defendants to answer or otherwise respond to the Complaint; and,
5. Dismissing the putative class claims with prejudice.

In support of this motion, Defendants incorporate by reference the accompanying memorandum in support.

WHEREFORE, Defendants respectfully request that this Court compel individual arbitrations against Defendants under 9 U.S.C. § 4, stay this litigation under 9 U.S.C. § 3, including Defendants' time to answer the Complaint, and dismiss the putative class claims with prejudice.

Respectfully submitted,

OGLETREE, DEAKINS, NASH,
SMOAK & STEWART, PC.

/s/ David L. Schenberg

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EMPLOYMENT, INC., COMMUNICATIONS
UNLIMITED OF THE SOUTH, INC., AND
COMMUNICATIONS UNLIMITED
CONTRACTING SERVICES, INC.**

CERTIFICATE OF SERVICE

I certify that a true copy of the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system on June 8, 2018, to the following:

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